



Daniel Szalkiewicz <daniel@lawdss.com>

---

## Case 2:21-cv-20706-SDW-ESK DOE v. SEBROW

1 message

---

**Daniel Szalkiewicz** <daniel@lawdss.com>  
To: Ira W Heller <iwhelleresq@gmail.com>

Mon, Dec 5, 2022 at 11:46 AM

Mr. Heller,

Please see the attached letter.

Very Truly Yours,

Daniel S. Szalkiewicz, Esq.

**Daniel Szalkiewicz & Associates, P.C.**

23 West 73rd Street, Suite 102

New York, New York 10023

Tel: (212) 706-1007

Direct Dial: (212) 760-1007

Cell: (929) 373-2735

Fax: (646) 849-0033



**2022.12.05 Letter to Heller re discovery.pdf**  
101K

Daniel Szalkiewicz  
& Associates

23 West 73<sup>rd</sup> Street  
Suite 102  
New York, NY 10023

T: (212) 706-1007  
F: (646) 849-0033  
lawdss.com

December 5, 2022

**Via E- Mail Only (iwhelleresq@gmail.com)**

Ira Heller Law, LLC.  
Attn: Ira Heller, Esq.  
1317 Morris Avenue  
Union, New Jersey 07083

**Re:    *JOHN DOE v. BAILA SEBROW***  
***United States District Court, District of New Jersey***  
***Case No.: 2:21-cv-20706***

Dear Mr. Heller,

Please accept this letter as a follow-up to a brief phone call we had on November 23, 2022, concerning the status of this matter.

On November 11, 2022, I sent you a copy of the court order dated November 10, 2022. The court order explicitly required you to perform specific actions, including:

1. Providing us your Rule 26(a)(1) disclosures by November 12, 2022;
2. Meet and confer with our office concerning e-discovery by November 19, 2022; and
3. Serve written discovery requests by November 19, 2022.

As of today, we have not received any of the items and you have not met with us to discuss e-discovery. Please provide your Rule 26(a)(1) disclosures by Wednesdays December 7, 2022 or else we will have no choice but to alert the court.

I note that pursuant to Rule 26(a)(1), you are required to disclose all potential witnesses, including those you stated on the phone have personal knowledge about my client.

Thank you.

Very Truly Yours,

DANIEL SZALKIEWICZ & ASSOCIATES, P.C.



By: Daniel S. Szalkiewicz, Esq.  
***daniel@lawdss.com***